

1 Valerie F. Horn, Esq. (CSB No. 151161)
2 VALERIE F. HORN & ASSOCIATES
3 A Professional Law Corporation
4 1901 Avenue of the Stars, Suite 1900
5 Los Angeles, California 90067-1507
6 Telephone: (310) 888-8494
7 Facsimile: (310) 888-8499
8 Email: thehornbooklaw@gmail.com

9 Attorneys for DEFENDANT/COUNTERCLAIMANT
10 WISDOM OF THE HEART CHURCH, A CALIFORNIA
11 NON-PROFIT COMPANY D/B/A THE UNIVERSITY
12 OF METAPHYSICAL SCIENCES

13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 INTERNATIONAL METAPHYSICAL)
16 MINISTRY, INC., an Arizona)
17 corporation,)

18 Plaintiff,

19 vs.

20 WISDOM OF THE HEART)
21 CHURCH, A CALIFORNIA)
22 NON-PROFIT COMPANY D/B/A)
23 THE UNIVERSITY OF)
24 METAPHYSICAL SCIENCE; and)
25 various unknown and/or fictional)
26 individuals and entities,)

27 Defendants.

Case No.: 4:21-cv-08066-KAW

Judge: Hon. Kandis A. Westmore

**DECLARATION OF CHRISTINE
BREESE IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

**[FILED CONCURRENTLY WITH
MOTION FOR SUMMARY
JUDGMENT; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF VALERIE F.
HORN AND REQUEST FOR
JUDICIAL NOTICE]**

TIME: TBD

DATE: JULY 20, 2023

COURTROOM: TBD

DECLARATION OF CHRISTINE BREESE

I, Christine Breese, declare as follows:

1. I am the Chief Executive Officer of Wisdom of the Heart Church, doing business as University of Metaphysical Sciences (“UMS”), and a Member of the Board of Directors thereof. I submit this Declaration in support of Defendant Wisdom of the Heart Church’s Motion for Summary Judgment Ordered by the Court on April 20, 2023. I have personal knowledge of the facts stated in this Declaration and if called upon to testify, I could and would competently testify thereto.

2. I read Plaintiff IMM’s Supplemental Brief filed on April 14, 2023 very carefully. [Dkt 141] On behalf of UMS, I had absolutely no understanding or knowledge either before or at the time of signing the Settlement Agreement, as to why Plaintiffs International Metaphysical Ministry and Paul Leon Masters Revocable Living Trust dated July 6, 2015, filed a Corrected First Amended Complaint [Dkt. No. 83] on January 25, 2019 in the underlying action, 4:18-cv-04524-SBA.

3. In particular, I had no knowledge before, or at the time of executing the Settlement Agreement, that “Theocentric Psychology” was not an active federally registered trademark when I signed the Settlement Agreement.

4. As I stated in my original declaration [Dkt 127-1, ¶3] when I executed the Settlement Agreement on or about August 9, 2019, I was under the good faith belief that the words, “University of Metaphysics,” “University of Sedona,” “International Metaphysical Ministry,” and “Theocentric Psychology” were duly registered trademarks through the United States Patent and Trademark Office, and that those registered trademarks were active and belonged to the Paul Masters Living Trust, which had granted an exclusive license to use those registered trademarks to International Metaphysical Ministry.

1 I declare under penalty of perjury under the laws of the United States of
2 America, that the foregoing is true and correct. Executed at Cuenca, Ecuador this
3 22nd day of May, 2023.

4
5 

6 Christine Breese
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28